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1 IN THE UNITED STATES DISTRICT COURT FOR THE  
2 NORTHERN DISTRICT OF OKLAHOMA

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W. A. DREW EDMONDSON, in his )  
5 capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
6 OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT,) )  
7 in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES)  
8 FOR THE STATE OF OKLAHOMA, )

)  
9 Plaintiff, )

)

10 vs. )4:05-CV-00329-TCK-SAJ

)

11 TYSON FOODS, INC., et al, )

)

12 Defendants. )

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14 THE DEPOSITION OF BILL RAY

15 ANDERSON, produced as a witness on behalf of the

16 Plaintiff in the above styled and numbered cause,

17 taken on the 10th day of July, 2007, in the City of

18 West Siloam Springs, County of Delaware, State of

19 Oklahoma, before me, Lisa A. Steinmeyer, a Certified

20 Shorthand Reporter, duly certified under and by

21 virtue of the laws of the State of Oklahoma.

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1 (Whereupon, the deposition began at

2 9:12 a.m.)

3 BILL RAY ANDERSON

4 having first been duly sworn to testify the truth,

5 the whole truth and nothing but the truth, testified

6 as follows:

7 DIRECT EXAMINATION

8 BY MR. GARREN:

9 Q Mr. Anderson, please state your name to the  
10 court.

11 A Bill R Anderson.

12 Q All right, and what is your address; where do  
13 you live?

14 A I don't know.

15 Q Give us the closest.

16 A They've changed that. I don't know what it  
17 is. Betty, she -- every letter or anything she has  
18 to write, she's the one that -- they've changed our  
19 address there where I live two or three times and I  
20 don't keep up with it because I know where I live.

21 Q Look at Page 27 of the Anderson documents I  
22 have here in front of you, if you would, please.

23 See the name and address on that particular  
24 document, which is a poultry waste management --

25 A Yeah, that's right.

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1 Q Going back to your application of urea to the  
2 property, to your three parcels of property, where  
3 do you obtain the urea?

4 A In what month?

5 Q Where do you get the urea?

6 A Oh. I get it from Chouteau Lime.

7 Q So you purchase it?

8 A Yes.

9 Q And do you pay for the urea?

10 A Yes, dearly.

11 Q I think Mr. Garren asked about this but I want  
12 to make sure it's clear. You testified that you  
13 built the houses, the poultry houses that are  
14 located at what we've called the old home place and  
15 down by Flint Creek; correct?

16 A Yes.

17 Q And did you borrow money from a bank or a  
18 financial institution to build those houses?

19 A I borrowed from a bank.

20 Q Who makes the payments on that note?

21 A I did.

22 Q Is it paid off now currently or are you still  
23 making payments?

24 A Yes. It's paid off.

25 Q Thank you. Do you have equipment that you --